

EXHIBIT 68-19



Valentino Dimitrov vs. Stavatti Aerospace. Ltd
Valentino Dimitrov

January 22, 2025

2:23-CV-00226-DJH

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually,
and on behalf of all others
similarly situated;

Plaintiff,

v.

Stavatti Aerospace. Ltd, a
Minnesota corporation; Stavatti
Aerospace Ltd, a Wyoming
corporation; Stavatti
Corporation, a Minnesota
corporation; Stavatti
Immobileare, Ltd. A Wyoming
corporation; Stavatti Niagara,
Ltd. A New York corporation;
Stavatti Super Fulcrum, Ltd, a
Wyoming corporation; Stavatti
Ukraine, a Ukrainien business
entity; Stavatti Heavy Industries
Ltd. A Hawaii corporation;
Christopher Beskar and Maja
Beskar, husband and wife; Brian
Colvin and Corrina Colvin,
husband and wife; John Simon and
Jean Simon husband and wife;
William Mcewen and Patricia
Mcewen, Husband and wife; Rudy
Chacon and Jane Doe Chacon.
Husband and wife; and DOES 1-10;
inclusive,

Defendants.

Case No.
2:23-CV-00226-DJH

Scottsdale, AZ
January 22, 2025

DEPOSITION OF VALENTINO DIMITROV

Prepared by:
Deborah L. Tucker, RPR
Certified Reporter
Certification No. 50464

**CERTIFIED
TRANSCRIPT**

Valentino Dimitrov vs. Stavatti Aerospace. Ltd
Valentino Dimitrov

January 22, 2025

2:23-CV-00226-DJH
42

10:44:25 1 Q. But you understood that they were looking for
10:44:30 2 money?

10:44:31 3 MR. CHEBAT: Objection, foundation.

10:44:33 4 THE WITNESS: Yeah.

10:44:34 5 BY MR. DUNMIRE:

10:44:34 6 Q. Yeah. Would you be willing to participate in a
10:44:44 7 lawsuit, potentially a class action, against Dale Morgan
10:44:48 8 for their failure to perform?

10:44:52 9 MR. CHEBAT: Objection, foundation.

10:44:55 10 THE WITNESS: I don't know.

10:44:57 11 BY MR. DUNMIRE:

10:45:01 12 Q. It's something we may speak to you about and your
10:45:06 13 attorney about.

10:45:11 14 So, is it your -- The Complaint would
10:45:20 15 indicate you don't really think of Stavatti as a real
10:45:22 16 company. Is that right?

10:45:24 17 A. Yes.

10:45:25 18 Q. Okay.

10:45:28 19 A. No, not now, I don't think it's real --

10:45:32 20 Q. You don't think it's a real company?

10:45:35 21 A. -- anymore.

10:45:36 22 Q. Okay.

10:45:36 23 A. No.

10:45:38 24 Q. But you think you were misled about what kind of
10:45:53 25 company it was by Brian Colvin?

Valentino Dimitrov vs. Stavatti Aerospace, Ltd
Valentino Dimitrov

January 22, 2025

2:23-CV-00226-DJH
43

10:46:02 1 A. Not just Brian Colvin --

10:46:10 2 Q. Rudy?

10:46:10 3 A. -- I mean, Rudy.

10:46:10 4 (Simultaneous speakers. Court reporter
10:46:10 5 clarification.)

10:46:10 6 THE WITNESS: Rudy. I mean, there was their
10:46:13 7 website. There was a lot of factors there.

10:46:16 8 BY MR. DUNMIRE:

10:46:16 9 Q. Do you think that Dale Morgan would have
10:46:20 10 committed to raise substantial funds for Stavatti if they
10:46:25 11 did not think Stavatti was a real company?

10:46:27 12 A. I don't think they committed to that time.

10:46:30 13 Q. So you --

10:46:31 14 A. It wasn't a commission -- I don't think it was a
10:46:35 15 commitment. I think it was a -- It showed that they were
10:46:39 16 in the process of doing it or -- I -- I -- I'm -- I don't
10:46:44 17 know specifics. It's -- it's something. I might not be
10:46:49 18 right.

10:46:49 19 Q. But you heard Rudy testify yesterday that Dale
10:46:53 20 Morgan appears to be a legitimate --

10:46:56 21 A. Company.

10:46:57 22 Q. -- company, right?

10:46:58 23 A. Yes.

10:46:58 24 Q. And in the business of raising funds?

10:47:00 25 A. Yes.

Valentino Dimitrov vs. Stavatti Aerospace, Ltd
Valentino Dimitrov

January 22, 2025

2:23-CV-00226-DJH
64

11:38:44 1 A. Yes.

11:39:07 2 Q. Since your money was deposited with Stavatti, has
11:39:11 3 anyone ever reached out to you to say your money was
11:39:14 4 received in error?

11:39:16 5 A. No.

11:39:17 6 Q. Has anyone ever reached out to you and said that
11:39:20 7 they would like to provide you a refund because you were
11:39:25 8 improperly providing funds?

11:39:28 9 A. No.

11:39:28 10 Q. Has anybody from Stavatti ever reached out to you
11:39:31 11 to offer you any of your funds back?

11:39:34 12 A. No.

11:39:36 13 Q. Isn't it true that you received a letter from
11:39:45 14 Christopher Beskar acknowledging that they owe you your
11:39:50 15 money back?

11:39:51 16 A. I can't recall it.

11:39:57 17 Q. Isn't it true that prior to filing this lawsuit
11:40:00 18 you sent a demand letter to Mr. Beskar?

11:40:03 19 A. Yes.

11:40:04 20 Q. And isn't it true that in response to that demand
11:40:08 21 letter he sent you a letter acknowledging that he owes
11:40:11 22 those funds?

11:40:12 23 A. Yes.

11:40:13 24 Q. Prior to investing you did review your Promissory
11:40:30 25 Note, correct?

Valentino Dimitrov vs. Stavatti Aerospace. Ltd
Valentino Dimitrov

January 22, 2025

2:23-CV-00226-DJH
73

1 STATE OF ARIZONA)

2 COUNTY OF MARICOPA)

3 BE IT KNOWN the foregoing deposition was
4 taken by me pursuant to stipulation of counsel; that I was
5 then and there a Certified Reporter of the State of
6 Arizona, and by virtue thereof authorized to administer an
7 oath; that the witness before testifying was duly sworn by
8 me to testify to the whole truth; notice was provided that
9 the transcript was available for signature by the
10 deponent; that the questions propounded by counsel and the
11 answers of the witness thereto were taken down by me in
12 shorthand and thereafter transcribed into typewriting
13 under my direction; that the foregoing pages are a full,
14 true, and accurate transcript of all proceedings and
15 testimony had and adduced upon the taking of said
16 deposition, all to the best of my skill and ability.

17 I FURTHER CERTIFY that I am in no way related to
18 nor employed by any parties hereto nor am I in any way
19 interested in the outcome hereof.

20 DATED at Phoenix, Arizona, this 5th day of
21 February, 2025.

22 
23 Deborah L. Tucker, RPR
24 Certified Reporter #50464
25